

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

A.J. and R.J., Minor Children, by)	
RAHUL JULKA, Their Father and Next)	
Friend, RAHUL JULKA, and KOMAL JULKA,)	
)	
Plaintiffs,)	Case No. 17-cv-02849
)	
v.)	Hon. Judge Matthew Kennelly
)	
Butler Illinois School District 53, et al.,)	Magistrate Judge Susan Cox
)	
Defendants.)	

DEFENDANTS' SUPPLEMENT TO THEIR TRIAL WITNESS DISCLOSURES
IN THE PROPOSED FINAL PRETRIAL ORDER

NOW COME the Defendants, School Board for Butler District 53, Heidi Wennstrom, Alan Hanzlik, and Kelly Voliva, by and through their attorneys, WIEDNER & McAULIFFE, LTD., and for their Supplement to the Final Pretrial Order regarding trial witness disclosures state as follows pursuant to Judge Kennelly's oral ruling on December 3, 2019 during the final pretrial conference:

The witnesses listed below will testify regarding the topics outlined herein:

Liz Chun: She has knowledge of and will testify regarding the Board's actions during the investigation of the academic dishonesty. She was more actively involved in the investigation than other Board members and will testify about this and the decision-making of the Board. She became Board president after Alan Hanzlik's term ended, and was president when the restrictions on the children were removed and letters removed from their student files; she will testify about this. She will also testify regarding her interactions with the community and their knowledge of the incident in relation to the parties' conduct. She will also testify regarding extra-curricular contests and the importance of them within the School District and Community. She will also testify regarding any trial exhibits Plaintiffs introduce that her name is on. Defendants do not intend to elicit testimony from her that would be cumulative of other testimony, aside to establish a foundation for her knowledge of other events that only she can testify about.

Alan Kumar: Dr. Kumar will testify regarding his vote to uphold the restrictions on the children and the rationale. He will further testify regarding his position at the same hospital that Dr. Julka worked at when the investigation was on going and when newspaper articles were published about this incident. He will testify about this and in rebuttal to Dr. Julka's testimony on this subject. Dr. Kumar will also testify in rebuttal to Dr. Julka's testimony about Dr. Kumar's alleged role in reduced patient referrals, which allegedly caused him to change employment. He will further testify regarding any exhibits of Plaintiffs that have his name on them. Defendants do not intend to elicit testimony from him that would be cumulative of other testimony, aside to establish a foundation for his knowledge of other events that only he can testify about.

Amy Read: She has knowledge of and will testify regarding her role as Butler's principal during the relevant time frame. She assisted Dr. Wennstrom with the investigation into the GeoBee at Butler Junior High (all other witnesses aside from Wennstrom only have knowledge of the investigation at Brook Forest, the elementary school). She also has knowledge of R.J. and A.J.'s time at Butler as it relates to their claim that they were harassed and called names by other students; she has knowledge of and will testify about the School's response to this. She will further testify as records custodian for Butler regarding what was contained within R.J. and A.J.'s student files and why at Butler. She has further information regarding the students' attendance which will rebut the Plaintiffs' claim regarding absences and tardies that they claim was caused by their medical conditions. She further will testify regarding their participation in many extra-curricular activities and achievements, in rebuttal to their damages claim. She will also testify regarding her interactions with and observations of the Julka family while R.J. and A.J. were students at Butler Junior High. She will testify regarding any trial exhibits Plaintiffs introduce that her name is on. Defendants do not intend to elicit testimony from her that would be cumulative of other testimony, aside to establish a foundation for her knowledge of other events that only she can testify about.

Jen Traub: She was a teacher at Brook Forest Elementary School and was the GeoBee coordinator for 2016; she has knowledge of what information she gave to participants to study for the GeoBee that none of the other witnesses have personal knowledge of. She will testify regarding these topics. She will also testify regarding how the GeoBee website appeared at the time that the Julkas registered as a homeschool and obtained copies of the contest questions and is expected to rebut certain assertions Defendants anticipate the Julkas or Trushar Patel will make at trial. She will also testify regarding the GeoBee itself and her observations during the GeoBee, and specifically, that because of the Julkas' conduct, a student did participate in and cheat on the GeoBee. This further explains the rationale for the restrictions placed on the Julka family. She will also testify regarding any trial exhibits Plaintiffs introduce that her name is on. Defendants do not intend to elicit testimony from her that would be cumulative of other testimony, aside to establish a foundation for her knowledge of other events that only she can testify about.

WHEREFORE, the Defendants pray that this Court deny Plaintiffs' Motion in Limine number 5 for the reasons stated on the record during the December 3, 2019 final pretrial conference and as outlined in Defendants' response to Plaintiffs' Motions in Limine, allow the

witnesses herein to testify consistently with this disclosure, and for all other relief that this Court deems just and proper.

Respectfully Submitted:

/s/ Rachel S. Nevarez

One of the Attorneys for Defendants School Board
for Butler District 53, Heidi Wennstrom, Alan
Hanzlik, and Kelly Voliva

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CERTIFICATE OF SERVICE

I, Rachel S. Nevarez, certify that I electronically filed Defendants' Supplement to Their Trial Witness Disclosures in the Proposed Final Pretrial Order with the Clerk of the Court using the CM/ECF system on December 4, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties that have not filed their appearances will receive this notice via regular e-mail. Parties may access this filing through the Court's electronic system.

/s/ Rachel S. Nevarez
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